

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION  
CIVIL ACTION NO.: \_\_\_\_\_**

Tracy Wright Starnes, )  
)  
Plaintiff, )  
)  
v. )  
)  
Paul Ward, both individually and as a )  
Sheriff's Deputy of Greenville County )  
Sheriff's Office, Seth Mills, both )  
Individually and as a Sheriff's Deputy of )  
Greenville County Sheriff's Office, )  
Greenville County Sheriff's Office, and )  
Hobart Lewis, as Sheriff of Greenville )  
County, and Lowes Foods, LLC, Lowe's )  
Food Stores, Inc., and Melissa Johnson, )  
)  
Defendants. )

**RESPONSES TO LOCAL RULE 26.01  
INTERROGATORIES**

Pursuant to Local Rule 26.01, these Defendants hereby answer the following Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: None at this time, nor expected.**

(B) As to each claim, state whether it should be tried jury or non-jury and why.

**RESPONSE: All claims should be tried by a jury because Plaintiff and these Defendants have demanded a trial by jury and the claims are triable by a jury.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE: No.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division) See Local Civil Rule 3.01.

**RESPONSE: Plaintiff originally filed in State Court (Greenville County Court of Common Pleas) and this action was removed by these Defendants due to Plaintiff's allegations that these Defendants violated federal statutes and U.S. constitutional law. These Defendants denied said allegations. The substantial part of the events giving rise to the allegations of the Plaintiff's Complaint occurred in Greenville County.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

**RESPONSE: No.**

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleadings reflecting the correct identification.

**RESPONSE: On information and belief, these Defendants are properly identified.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE: Not Applicable.**

(H) In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

**RESPONSE: Not Applicable.**

Willson Jones Carter & Baxley, P.A.

s/Charles F. Turner, Jr.

Charles F. Turner, Jr. (Fed. ID 05849)

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